

# **EXHIBIT K**

MAYER • BROWN

Mayer Brown LLP  
Two Palo Alto Square, Suite 300  
3000 El Camino Real  
Palo Alto, California 94306-2112

Main Tel +1 650 331 2000  
Main Fax +1 650 331 2060  
www.mayerbrown.com

May 22, 2012

BY EMAIL

Daniel J. Walker, Esq.  
Berger & Montague, P.C.  
1622 Locust Street  
Philadelphia PA 19103

Eric B. Evans  
Direct Tel +1 650 331 2063  
Direct Fax +1 650 331 4563  
eevans@mayerbrown.com

Re: *In re: High-Tech Employee Antitrust Litigation*,  
Case No. 11-CV-2509 LHK

Dear Mr. Walker:

I write to respond to your letters and email messages to my colleague, Mr. Rubin, dated May 8, May 9, and May 15 2012. As Mr. Rubin has informed you, Google has already produced information that it understands to correspond to the “employee-level” information requested in your letter.

Google intends to provide additional data in categories already provided to plaintiffs on a rolling basis, and expects to complete its production of data by Friday, May 25. Google will also make a supplemental production of data before close of business today. Google addresses below a number the issues raised in your May 8 and May 15 letters, which are also addressed in the information Google will produce today:

**I. Questions relating to employee-level personnel data:**

- Google produced employee-level personnel data on May 9, bates numbered Goog-HIGH TECH-00057188. Google intends to supplement this data by close of business today, May 22.

**II. Questions relating to GOOG-HIGH TECH-00054553-Employee\_data:**

- Google will produce updated information covering the period between 1/1/2001 and 12/31/2011 as part of its supplemental production, mentioned above.
- The fields p.workexp\_company\_1 and p.workexp\_company\_2 represent Google’ employees’ self-reporting of information regarding their prior employers.
- The field “m.location\_code” reflects the geographical location of the employee’s primary workplace at the time that the value was entered. A lookup table for the field “m.location\_code” is attached as Attachment A.

Daniel J. Walker, Esq.  
May 22, 2012  
Page 2

- Google does not collect information regarding its employees' salaries at their previous employers.
- In some cases, information about how an employee first contacted Google, was first contacted by Google, and the employee's educational achievements may be available in Google's databases, but is tracked in a database from which Google will produce reports by May 25, 2012.
- Google will also supplement its earlier production of data to include details regarding applicants' job titles at prior employers, to the extent that this information is reasonably accessible. Google has already produced information regarding applicants' educational background in the fields e.school\_name and e.degree in the file GOOG-HIGH TECH-00054554-Applicant\_data-CONFIDENTIAL—ATTORNEY'S EYES ONLY.csv.

### III. Questions relating to GOOG-HIGH TECH-00054554-Applicant\_data:

- The following values found in the field "a.application\_type" have the following meanings:

Direct Employee Applicant	an application by someone not formerly a Google employee for employment at Google
Employee Rehire	an application by a former Google employee who was officially terminated for employment at Google
Intern Conversion	an application by a Google intern for full-time employment at Google
Intern Rehire	an application by a Google intern who was officially terminated for full-time employment at Google
Internal Transfer	an application by a current Google employee for employment in a different position at Google
M&A Applicant	an application by a person employed by a company Google has acquired for employment at Google
New Grad	an application by a new college graduate for employment at Google
Temp Conversion	an application by a Google temp worker for full-time employment at Google
Temp Rehire	an application by a Google temp worker for full-time employment at Google

Daniel J. Walker, Esq.  
May 22, 2012  
Page 3

- Google will supplement its production of data to include information about applicants' prior employers and the applicant's most recent application status (e.g., hired, interviewed, rejected). Google will also supplement its production of information to show how particular applications originated, to the extent this information was recorded.
- Google will produce data about cold calls that reflects cold calling, to the extent that it is available. Google does not systematically track cold calls and is unlikely to have detailed—or any—information about a cold call recipient's salary, education, position, or years of experience.

At this point, Google believes that informal contact between Google employees and plaintiffs' counsel is unnecessary.

Very truly yours,

A handwritten signature in black ink, appearing to read 'EB Evans', with a stylized, flowing script.

Eric B. Evans

## Attachment A

## Google Location Codes

## m.location\_code

**US\_ARB** Ann Arbor, US  
**US\_AST** Austell Data Center Shipping Address, GA  
**US\_ATL** Atlanta, Georgia (Midtown)  
**US\_AUS** Austin, US  
**US\_BEV** Beverly Hills, US  
**US\_BIR** Birmingham, US (Detroit Sales Office)  
**US\_BLD** Boulder, CO  
**US\_BOS** Boston Temporary Esuite, US  
**US\_BOT** Bothell, US  
**US\_BRM** Burlingame, US  
**US\_CAM** Cambridge (MA), US  
**US\_CBF** Data Center, Council Bluffs, US  
**US\_CHAP** Chapel Hill, US  
**US\_CHI** Chicago, US  
**US\_CHS** Data Center, Moncks Corner, US  
**US\_COP** Coppell, US  
**US\_COR** Coral Gables, US  
**US\_CPK** Clifton Park, US  
**US\_DAL** Addison, US  
**US\_DEN** Denver, US  
**US\_DET** Detroit, US  
**US\_DLS** Columbia House, The Dalles, OR  
**US\_FRE** Fremont  
**US\_HER** Herndon, VA  
**US\_HOME** Home (various US locations)  
**US\_IBM** US - IBM Vendors  
**US\_IRV** Irvine, US  
**US\_KCI** Kansas City, US  
**US\_KIR** Kirkland, US  
**US\_LAX** Data Center, Los Angeles, US  
**US\_LEX** Lexington, US  
**US\_LNR** Data Center, Lenoir, NC, US  
**US\_LONE** Lone Tree, US (dMarc)  
**US\_LUI** Louisville (CO), US  
**US\_MEN** Google Garage, Menlo Park, US  
**US\_MFT** Moffett Field, US  
**US\_MNK** Data Center, Moncks Corner, US  
**US\_MNKS** Data Center, Moncks Corner (Mount Holly), SC  
**US\_MSN** Madison, US  
**US\_MTV** 1015 Joaquin Road  
**US\_NEW** Newport Beach, US  
**US\_NYC** New York City, US

## m.location\_code

**US\_OLP** Overland Park, US (dMarc)  
**US\_PAO** 1129 San Antonio Road  
**US\_PDX** Portland, OR  
**US\_PHL** Philadelphia, Pennsylvania  
**US\_PHX** Phoenix, US  
**US\_PIT** Pittsburgh, PA  
**US\_PLV** Playa Vista, US  
**US\_PQI** Presque Isle, US  
**US\_PRY** Data Center, Pryor Creek, US  
**US\_REMOTE** United States - Remote, General  
**US\_RES** Data Center, Virginia, US  
**US\_RWC** Redwood City, US  
**US\_SAN** San Diego, US  
**US\_SBO** San Bruno, US  
**US\_SEA** Seattle, US  
**US\_SFO** San Francisco, US  
**US\_SMO** Santa Monica, US  
**US\_SMT** San Mateo, CA (AdMob)  
**US\_SOU** Harvard  
**US\_SQL** San Carlos, US  
**US\_SUW** Data Center, Suwanee, GA, US  
**US\_SVL** 494 S. Bernardo  
**US\_TAM** Tamarac, US  
**US\_THN** Thornton, US  
**US\_THO** Thornton, US  
**US\_WAS** Washington DC, US  
**US\_WRJ** White River Junction